

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

<hr/> IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION <hr/>	: Master File No. 12-md-02311 : Honorable Marianne O. Battani
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In Re: Occupant Safety Systems	: 2:12-cv-00600
In Re: Alternators	: 2:13-cv-00700
In Re: Anti-Vibrational Rubber Parts	: 2:13-cv-00800
In Re: Windshield Wipers	: 2:13-cv-00900
In Re: Radiators	: 2:13-cv-01000
In Re: Starters	: 2:13-cv-01100
In Re: Automotive Lamps	: 2:13-cv-01200
In Re: Switches	: 2:13-cv-01300
In Re: Ignition Coils	: 2:13-cv-01400
In Re: Motor Generator	: 2:13-cv-01500
In Re: Steering Angle Sensors	: 2:13-cv-01600
In Re: HID Ballasts	: 2:13-cv-01700
In Re: Inverters	: 2:13-cv-01800
In Re: Electronic Powered Steering	: 2:13-cv-01900
Assemblies	: 2:13-cv-02100
In Re: Fan Motors	: 2:13-cv-02200
In Re: Fuel Injection Systems	: 2:13-cv-02300
In Re: Power Window Motors	: 2:13-cv-02400
In Re: Automatic Transmission Fluid	: 2:13-cv-02500
Warmers	: 2:13-cv-02700
In Re: Valve Timing Control Devices	: 2:13-cv-02800
In Re: Air Conditioning Systems	: 2:14-cv-02900
In Re: Windshield Washer Systems	:
In Re: Constant Velocity Joint Boot Products	:
	:
<hr/> THIS DOCUMENT RELATES TO: Direct Purchaser Actions Dealership Actions End-Payor Actions <hr/>	: : : :

PLAINTIFFS' MOTION FOR SUBMISSION OF GLOBAL ORDERS

Direct Purchaser Plaintiffs, Dealership Plaintiffs, and End-Payor Plaintiffs (collectively, “Plaintiffs”), hereby move for an order from the Special Master directing that the following three global orders shall be submitted in each of the above-captioned actions and all future cases filed by Plaintiffs that are coordinated as part of *In re Automotive Parts Antitrust Litigation*, MDL 2311 (“Coordinated Actions”): (1) the Stipulation and Order Regarding Production of Electronically Stored Information and Hard Copy Documents (“Global ESI Order”); (2) the Stipulation and Order Regarding Non-Discoverability of Certain Expert Materials and Communications (“Global Expert Order”); and (3) the Stipulated Agreement and Order Regarding Preservation of Documents, Electronically Stored Information, and Other Tangible Items (“Global Preservation Order”) (collectively, “Global Orders”).¹

The submission of Global Orders in the Coordinated Actions is necessary for the efficient prosecution of the Coordinated Actions. Submission of such Global Orders is consistent with both the Court’s repeated admonitions that the parties coordinate and agree upon template orders wherever possible, and the very purpose of a multidistrict litigation, in which related actions, such as those at issue here, are efficiently managed and coordinated in order to “avoid duplication of discovery, to prevent inconsistent pretrial rulings, and to conserve the resources of the parties, their counsel and the judiciary.” *Overview of Panel*, The Official Website for the United States Judicial Panel on Multidistrict Litigation, <http://www.jpml.uscourts.gov/panel->

¹ Global Orders do not need to be submitted in the following actions because virtually identical orders have already been negotiated, agreed to by the parties and entered: *Wire Harness*, 2:12-cv-00100; *Instrument Panel Clusters*, 2:12-cv-00200; *Fuel Senders*, 2:12-cv-00300; *Heater Control Panels*, 2:12-cv-00400; and *Bearings*, 2:12-cv-00500. In *Occupant Safety Systems*, 2:12-cv-00600, the Court entered an Expert Order and ESI Order, but the parties have not yet negotiated and submitted a Preservation Order. Plaintiffs are not seeking to submit Global Orders in the *Air Flow Meters*, 2:13-cv-02000, and *Electronic Throttle Bodies*, 2:13-cv-02600 cases because those cases and claims asserted therein were combined into the *Fuel Injection Systems* action, 2:13-cv-02200.

info/overview-panel. *See also In re Automotive Wire Harness Sys. Antitrust Litig.*, 844 F. Supp. 2d 1367, 1367 (J.P.M.L. 2012).

Accordingly, for the reasons set forth herein and in the accompanying memorandum in support of this Motion, Plaintiffs respectfully request that the Special Master grant the Motion.

As required by Local Rule 7.1(a), counsel for Plaintiffs sought agreement for the relief sought herein from counsel for Defendants² on several occasions, most recently on June 8, 2015, and identified the nature of the Motion. Plaintiffs have not received such agreement from Defendants.

Respectfully submitted,

Dated: June 17, 2015

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² Counsel for Plaintiffs conferred with Steven F. Cherry, counsel for DENSO, who represented that he was speaking on behalf of all of the Defendants in the above-captioned actions.

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**MEMORANDUM IN SUPPORT OF PLAINTIFFS' MOTION FOR SUBMISSION OF
GLOBAL ORDERS**

Direct Purchaser Plaintiffs, Dealership Plaintiffs and End-Payor Plaintiffs, (collectively, “Plaintiffs”), hereby move for an order from the Special Master directing that the following three global orders shall be submitted to the Court in each of the above-captioned actions¹ and all future cases filed by Plaintiffs that are coordinated as part of *In re Automotive Parts Antitrust Litigation*, MDL 2311 (“Coordinated Actions”): (1) the Stipulation and Order Regarding Production of Electronically Stored Information and Hard Copy Documents (“Global ESI Order”); (2) the Stipulation and Order Regarding Non-Discoverability of Certain Expert Materials and Communications (“Global Expert Order”); and (3) the Stipulated Agreement and Order Regarding Preservation of Documents, Electronically Stored Information, and Other Tangible Items (“Global Preservation Order”) (collectively, “Global Orders”).²

To date, Plaintiffs have expended considerable time and resources negotiating the terms of the Global Orders separately with six sets of Defendants in six separate cases. Plaintiffs and Defendants are in agreement that, subject to limited exceptions, the ESI, Expert, and Preservation Orders entered in these actions will serve as templates in all other cases subject to the Auto Parts MDL for which those Orders have yet to be entered. However, the parties

¹ Separate ESI, Expert, and Preservation Orders have already been entered in the following cases: *Wire Harness*, 2:12-cv-00100; *Instrument Panel Clusters*, 2:12-cv-00200; *Fuel Senders*, 2:12-cv-00300; *Heater Control Panels*, 2:12-cv-00400; and *Bearings*, 2:12-cv-00500. In *Occupant Safety Systems*, 2:12-cv-00600, the Court entered an Expert Order and ESI Order, but the parties have not yet negotiated and submitted a Preservation Order. Plaintiffs are not seeking to submit Global Orders in the *Air Flow Meters*, 2:13-cv-02000, and *Electronic Throttle Bodies*, 2:13-cv-02600 cases because those cases and the claims asserted therein were combined into the *Fuel Injection Systems* action, 2:13-cv-02200.

² Although not the subject of this Motion, for the reasons stated herein, and a number of other compelling reasons, submission of a single Global Protective Order in each of the Coordinated Actions is appropriate. Plaintiffs and Defendants are continuing to meet and confer regarding this issue. If the parties cannot reach agreement shortly, Plaintiffs intend to file a motion with the Special Master for the submission of a Global Protective Order.

disagree as to whether they should be required to negotiate and submit separate orders for each of the Coordinated Actions or whether they may submit a single Global ESI Order, Global Expert Order, and Global Preservation Order in each of the Coordinated Actions.

The submission of Global Orders is necessary for the efficient prosecution of the Coordinated Actions. It is consistent with both the Court's repeated admonitions that the parties coordinate and agree upon templates wherever possible as well as the very purpose of a multidistrict litigation, in which related actions such as these are coordinated in order to "avoid duplication of discovery, to prevent inconsistent pretrial rulings, and to conserve the resources of the parties, their counsel and the judiciary." *Overview of Panel*, The Official Website for the United States Judicial Panel on Multidistrict Litigation, <http://www.jpml.uscourts.gov/panel-info/overview-panel>. See also *In re Automotive Wire Harness Sys. Antitrust Litig.*, 844 F. Supp. 2d 1367, 1367 (J.P.M.L. 2012).

ARGUMENT

There are numerous benefits to having one set of Global Orders in each of the Coordinated Actions. *First*, the submission of Global Orders applicable to all of the Coordinated Actions avoids the gross inefficiency and duplication that would arise if Plaintiffs were forced to negotiate and enter into each of these orders separately with Defendants in each case. By way of example, Plaintiffs first provided Defendants with a draft of the Global Orders on April 24, 2015.³ Notwithstanding Plaintiffs' repeated efforts to negotiate the terms of these Global Orders with Defendants, End-Payor and Automotive Dealer Plaintiffs recently received an entirely separate case-specific proposal from Defendants in the Anti-Vibrational Rubber Products case.

³ Counsel for Plaintiffs sent the draft Global Orders to Steven F. Cherry, counsel for DENSO, who represented that he was speaking on behalf of all of the Defendants.

As explained in more detail below, requiring Plaintiffs to negotiate each of these orders separately with Defendants in each of the Coordinated Actions is contrary to the very purpose of an MDL and would result in gross inefficiencies and unnecessary legal fees and costs to be incurred by the parties.

Second, use of Global Orders in all of the Coordinated Actions would, in keeping with the Order of the Judicial Panel on Multidistrict Litigation (“JPML”) centralizing proceedings in this Court, avoid the potential for inconsistent rulings should Defendants in different cases insist on different provisions. *In re Automotive Wire Harness Sys. Antitrust Litig.*, 844 F. Supp. 2d 1367, 1367 (J.P.M.L. 2012). *See also Overview of Panel*, The Official Website for the United States Judicial Panel on Multidistrict Litigation, <http://www.jpml.uscourts.gov/panel-info/overview-panel> (“The purposes of this transfer or ‘centralization’ process are to avoid duplication of discovery, to prevent inconsistent pretrial rulings, and to conserve the resources of the parties, their counsel and the judiciary.”). Similarly, using Global Orders would preserve both the Court and the Special Master’s time and resources by obviating the need, should disputes arise, to interpret at least 30 separate ESI, Expert, and Preservation Orders.

Third, it is far more manageable for the Court, the Special Master, Plaintiffs and the Defendants – many of whom are named in multiple cases⁴ – to review and comply with a single Global Order as opposed to 30 separate documents addressing the same issue.

Plaintiffs’ proposed approach is consistent with the Court’s directives as well as the decision by the JPML, which in creating this MDL, explicitly held that “[c]entralization will eliminate duplicative discovery; prevent inconsistent pretrial rulings, including with respect to class certification; and conserve the resources of the parties, their counsel, and the judiciary.” *In*

⁴ For instance, DENSO is named as a defendant in 18 of the actions in this MDL.

re Automotive Wire Harness Sys. Antitrust Litig., 844 F. Supp. 2d 1367, 1367 (J.P.M.L. 2012). See also Order on Briefing in *In re: Automotive Parts Antitrust Litig.*, No. 12-md-02311 (Sept. 2, 2014) (ECF No. 793) (streamlining the resolution of a large volume of dispositive motions in the Auto Parts Litigation); Transcript of November 13, 2013 Status Conference at 53, No. 12-md-02311 (ECF No. 659) (Battani, J.) (discussing the parties' coordination efforts in conducting depositions and concluding that "given the size and nature of this case that cooperation is critical."); Transcript of June 4, 2014 Status Conference at 52 (ECF No. 744) (Battani, J.) (extolling the need for the appointment of a Special Master to facilitate coordination and emphasizing that "as we go into the discovery we need protocol, *we need coordination . . .*") (emphasis added).

Conversely, Defendants have offered no persuasive explanation as to why the submission of Global Orders is not feasible, let alone not preferable. Defendants have suggested that, depending upon the case, there may be minor differences in preservation periods and other terms. While Plaintiffs do not currently take a position on whether differing provisions are warranted, Plaintiffs have explained to Defendants, that, if appropriate, such potential minor discrepancies can easily be addressed in the footnotes or an appendix to a single global document.

Defendants have also asserted that Global Orders are not appropriate here because this is not a "true" MDL, whatever that may mean. Plaintiffs obviously disagree with Defendants' characterization of the Coordinated Actions, which is belied by the "In re Automotive Parts Antitrust Litigation, MDL 2311" caption in each of these cases. See also *In re Automotive Wire Harness Sys. Antitrust Litig.*, 867 F. Supp. 2d 1349, 1351 (J.P.M.L. 2012) (creating a single MDL here because "similar conspiracies are alleged involving overlapping defendants and

stemming from the same government investigation, and the parties and counsel already overlap to such a large extent.”).

Even more important than semantics, the Court has consistently made it clear that the parties, where feasible, must make every effort to coordinate across all of the Coordinated Actions and agree upon templates governing common issues and subjects across all cases. Defendants’ refusal to agree to coordinate here is clearly contrary to the Court’s instructions.

CONCLUSION

For the foregoing reasons, Plaintiffs respectfully submit that the Special Master should grant Plaintiffs’ Motion for submission of a Global ESI Order, Global Preservation Order and a Global Expert Order.

Respectfully submitted,

Dated: June 17, 2015

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Dated: June 17, 2015

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**UNITED STATES DISTRICT COURT
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IN RE: AUTOMOTIVE PARTS
ANTITRUST LITIGATION

Master File No. 12-md-02311
Honorable Marianne O. Battani

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 Dealership Actions
 End-Payor Actions

CERTIFICATE OF SERVICE

I hereby certify that on June 17, 2015, I electronically filed the foregoing documents with the Clerk of the Court using the ECF system, which will send electronic notification of such filings upon all registered counsel of record.

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